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September 11, 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

BY COURIER

William F. Caton
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

**ORAL EX PARTE
PRESENTATION**

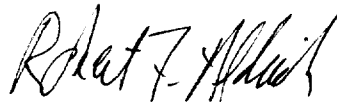
Re: **CC Docket No. 94-102**

Dear Mr. Caton:

We hereby submit information on behalf of the MultiMedia Telecommunications Association ("MMTA") in the above-referenced docket.

On Friday, September 6, 1996, Robert Aldrich of this law firm met with Greg Cooke and Alan Thomas of the Common Carrier Bureau Network Services Division staff. We discussed the format, procedures, and agenda for the Commission's ex parte meeting scheduled for September 19-20, 1996. Mr. Aldrich reviewed MMTA's position in this proceeding and handed out the attached document, which has been previously submitted in the record of this proceeding.

Sincerely,



Robert F. Aldrich

RFA/nw
Enclosure

cc: Mr. Greg Cooke
Mr. Alan Thomas

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EX PARTE PRESENTATION -- CC DOCKET NO. 94-102

MULTI-MEDIA TELECOMMUNICATIONS ASSOCIATION (MMTA)

- ◆ **SMALL SYSTEM EXEMPTION FROM E911 CPE RULES**
- ◆ **PREEMPTION OF INCONSISTENT STATE REQUIREMENTS**

SUMMARY

- ◆ Small systems: $<$ or $=$ 200 stations
- ◆ Small system compliance costs are very high
- ◆ Most small systems pose no major location problems
- ◆ FCC should --
 - ◆ Exempt small systems from new Part 68 manufacturer requirements
 - ◆ Exempt small systems customers from providing location ID except in special settings
 - ◆ Allow special-setting customers a choice of location ID method
 - ◆ Preempt state requirements conflicting with these principles

COST OF COMPLIANCE

- ◆ Estimated average cost of small systems = \$350 per station
- ◆ Designing built in location ID capability will take time -- and in short run requires designing for technology viewed as obsolescent (CAMA trunks)
- ◆ Short run solutions generally require costly adjunct equipment (current cost est. \$15,000- \$20,000 per system, plus recurring administrative cost)
- ◆ Additional costs for CAMA trunks are substantial (recurring charge est. \$1,200 per system annually -- more if more than two trunks required). Questions re carriers' ability to engineer, install, and maintain thousands or millions of CAMA trunks.

CURRENTLY THERE ARE SOME 3 MILLION SMALL SYSTEMS INSTALLED.

NEED FOR REGULATION IS LIMITED

- ◆ Need for more precise location ID is limited in small-system environment:
 - ◆ Residential PBX-Centrex (e.g., dormitories, apartment buildings)
 - ◆ Multi-location business (e.g., bank branches)
- ◆ Typical small system serving business users on one or a few floors of one building -- does not need to be regulated

ILLINOIS LAW TO TAKE EFFECT JUNE 30, 1996:

"(a) [a new or replacement 'private business switch service'] shall provide to those business end users the same level of 9-1-1 service as the public agency and the telecommunications carrier are providing to other business end users of the local 9-1-1 system. This service shall include, but not be limited to, the capability to identify the telephone number, extension number, and the physical location that is the source of the call to the number designated as the emergency telephone number. . . .

"(b) The private business switch operator is responsible for forwarding end user automatic location identification record information to the 9-1-1 system provider according to the format, frequency, and procedures established by that system provider."

50 ILCS 750/15.6

OVERLY BURDENSOME STATE REQUIREMENTS:

- ◆ impose massive and unnecessary compliance costs
- ◆ generate costly litigation among injury victims, employers and equipment and service suppliers
- ◆ lock manufacturers into obsolescent technology
- ◆ complicate the design of CPE for nationwide distribution

CONCLUSION

- ◆ Exempt small systems from new Part 68 manufacturer requirements
- ◆ Exempt small system customers from providing E911 location ID except in special settings (e.g., residential, multi-site)
- ◆ Allow special-setting customers a choice of location ID method
- ◆ Preempt state requirements conflicting with these principles